Marianne Dugan, Attorney OSB # 932563 259 E. 5th Ave., Suite 200-D Eugene, OR 97401 (541) 338-7072 Fax 866-650-5213 mdugan@mdugan.com

Attorney for Plaintiff

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

JAMES M. MURPHY, M.D.

CASE NO. 3:14-cv-01498-SI

Plaintiff,

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

V.

TUALITY HEALTHCARE, ORAL ARGUMENT REQUESTED

Defendant.

Pursuant to Federal Rule of Civil Procedure 56, plaintiff, by and through his undersigned attorney, hereby moves the Court for partial summary judgment on the issue of whether Dr. Murphy was an employee. The parties conferred and this motion is opposed. This motion is based upon the Memorandum and the Declarations and Exhibits filed with the court.

DATED August 12, 2015.

Respectfully submitted,

/s/ Marianne Dugan Marianne Dugan, Oregon State Bar # 932563, 259 E. 5th Ave., Ste 200-D Eugene, OR 97401 (541) 338-7072 mdugan@mdugan.com Attorney for Plaintiff